Alan F. Ciamporcero
Fixe in verification

Federat Begulatory Relation 3 775 Pennsylvania Avenus, Nied Indrin alt Washington D.C. 20004 7021 383-6416

EX PARTE OR LATE FILED



DOCKET FILE COPY ORIGINAL

December 14, 1994

RECEIVED

IDEC 1 4 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

EX PARTE

William F. Caton Acting Secretary Federal Communications Commission Mail Stop 1170 1919 M Street, N.W., Room 222 Washington, D.C. 20554

Dear Mr. Caton:

Re: CC Docket No. 94-54, Equal Access and Interconnection Pertaining to Commercial Mobile Radio Services

Yesterday afternoon, Jim Tuthill of Pacific Bell, and I met with Don Gips, Greg Rosston, Andrew Sinwell, and Florence Setzer of the Office of Plans and Policy to discuss issues contained in the attached document which was used during the meeting. Please associate this material with the above-referenced proceeding.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

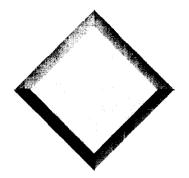
Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Alan F. Clamporcero
Attachment

cc: Don Gips Greg Rosston Andrew Sinwell Florence Setzer

No. of Copies rec'd O+1
List A B C D E



BRINGING MOBILITY TO THE MASS MARKET

PACIFIC BELL MOBILE SERVICES

CC DOCKET NO. 94-54

DECEMBER 13,1994



PACIFIC BELL MOBILE SERVICES



- * RESALE AND NUMBER TRANSFERABILITY
- * ROAMING
- * EQUAL ACCESS
- * MUTUAL COMPENSATION
- *** INTERCONNECTION**

RESALE AND NUMBER TRANSFERABILITY

- □ CELLULAR HAS A 12 YEAR HEAD START
- NUMBER TRANSFERABILITY PROMOTES COMPETITION
 - ✓ ALLOWS FASTER MARKET ENTRY
- ⇒ EXISTING RESALE RULES REMAIN IN PLACE, NPRM, CC DOCKET NO. 94-54, PARA 123
 - ✓ INCLUDES RIGHT TO NUMBER

 TRANSFERABILITY, APPLICATION OF GTE

 MOBILNET OF HOUSTON, 1987 FCC LEXIS 3539, PARA 6.
 (1987)
- ⇒ CELLULARS' MOTIVE IN DENYING IT IS TO STIFLE NEW COMPETITION



- → COMMISSION NEEDS TO MANDATE RIGHT
 TO ROAM ONTO ANALOG CELLULAR
 - **✓** ROAMING PROVIDES UBIQUITY
 - **✓** GOOD FAITH NEGOTIATIONS
 - **✓ PROMOTES COMPETITION**
- ⇒ CELLULAR WILL NOT VOLUNTARILY
 PROVIDE ROAMING TO NEW ENTRANTS
- ➡ WITHOUT ROAMING, NEW ENTRANTS WILL BE AT A SIGNIFICANT DISADVANTAGE
- **⇒** SECTION 201 PROVIDES RIGHT TO ROAM WHICH IS REAFFIRMED IN 6002(C)(1)(B)



- ⇒ THE SAME EQUAL ACCESS REQUIREMENTS
 SHOULD BE APPLIED TO ALL CMRS
 PROVIDERS
- ⇒ PROMOTES REGULATORY SYMMETRY ADOPTED BY CONGRESS AND THE COMMISSION IN CC DOCKET 93-252
- ⇒ SERVICE AREAS SHOULD BE MTAs

MUTUAL COMPENSATION

- ⇒ PRIMARILY A STATE ISSUE
 - **✓** MOST WIRELESS CALLS ARE INTRASTATE
 - ✓ COMMISSION HAS NOT PREEMPTED
 TERMS AND CONDITIONS OF
 INTERCONNECTION ARRANGEMENTS,
 SECOND REPORT AND ORDER, DOCKET 93-252, PARA 231,
 MARCH 7, 1994
- **⇒** CUSTOMERS' EXPECTATIONS
 - **✓** WIRELESS IS STILL DISCRETIONARY
 - ✓ LANDLINE CUSTOMERS WOULD HAVE TO BE CHARGED



⇒ PRESENT SYSTEM--GOOD FAITH NEGOTIATIONS--IS WORKING

⇒ CONSISTENT WITH FORBEARANCE ADOPTED
IN CC DOCKET 93-252